

24 Q. When it first came up, there were a few

25 identified customers for whom dial tone had been lost?
0081

1 A. Correct.

2 Q. And going through Kathy Flynn Miles, were you
3 able to try to correct the problem?

4 A. I don't remember exactly who we went to. I know
5 that the no dial tone issue was brought up to Kathy Flynn
6 Miles and we asked MCI, we wrote letters to all the
7 customers, there were seven of them who lost dial tone.

8 Q. So Pacific Bell wrote letters to the customers?

9 A. Per MCI's request, to the seven customers who
10 lost dial tone.

11 Q. Do you remember what the letter said?

12 A. That MCI and Pacific Bell had a joint venture
13 and that we were, basically -- this isn't the wording,
14 okay, but we were sorry, that it was our fault, that we --
15 that the process didn't work properly. And we wrote seven
16 letters. So we wrote them to everybody.

17 Q. Was there a system implemented to address loss
18 of dial tone orders thereafter?

19 A. That was something they were working on, an
20 escalation thing, but I don't think it was actually put in
21 place at that time.

22 Q. Was it ever put in place?

23 A. Yes.

24 Q. Do you know when?

25 A. I don't know the exact date, no.

0082

1 Q. Do you know an approximation, before January

2 '97?

3 A. I don't know it was in writing, an actual

4 escalation policy in writing to MCI, but they did through

5 a manager in the LISC, Victoria Flood.

6 MR. KOLTO-WININGER: Listen to the question,

7 though. He is asking you whether it was before January.

8 MR. McDONALD: Q. If MCI experienced -- one of

9 its customers experienced loss of dial tone, and MCI

10 became aware of it, that it should contact Victoria Flood

11 at the LISC?

12 A. I believe so.

13 Q. Do you know what her role is at the LISC?

14 A. She is a supervisor, manager.

15 Q. Is she subordinate to Ann Long?

16 A. She was. I am not sure who she reports to. She

17 reports to Chuck McDonald now.

18 Q. Do you know what caused loss of dial tone?

19 A. Yes.

20 Q. Can you explain?

21 A. There's been more than one reason.

22 Q. Okay.

23 A. Two billing systems on a migration changing from

24 one billing system to another billing system.

25 Q. Why does that cause a loss of dial tone?

0083

1 A. Because -- I don't know the technical reasons,

2 but it has -- but it's gotten better and we are not

3 experiencing that problem as much anymore. And the other
4 reason is MCI not putting the correct hunting on the
5 orders, and when they would change it, it would knock the
6 customer out of service.

7 Q. Can you explain what that means, not putting the
8 correct hunting?

9 A. MCI had no way to issue orders with more than
10 one hunt group electronically. And they didn't understand
11 that if a customer had, say, two hunt groups, they ran
12 them all the together. And the customer called irate
13 because their hunting was all messed up. And to change a
14 hunting order, you could have downtime of dial tone.
15 That's a known fact. And it was -- frequent problems MCI
16 had with hunting and loss of dial tone.

17 Q. When did that occur?

18 A. I am trying to think of when. I know the one
19 time was January 11th. It was a Saturday because it was
20 my anniversary because they were paging me and paging me
21 with their hunting problems. It was January. I know that
22 happened in that time frame, and probably it happened
23 before, but they didn't come on line with business orders;
24 it was mostly residences in the beginning.

25 Q. Are you aware that the operation of the LISC was
0084

1 such that the migration required a disconnect order as
2 well as a migrate order, and if those two things became
3 separated --

4 A. Correct.

7 A. Call waiting, call forwarding, three-way

8 calling, those kind of things. It's not a loss of dial

9 tone.

10 Q. And when did that problem first appear?

11 A. I don't know exactly. It's happened throughout

12 the process.

13 Q. Does it continue to be a problem?

14 A. I believe it's gotten better.

15 Q. Is it like dial tone, that there was a problem

16 that was at the beginning and it has continued over time,

17 and while you believe it's better, it's still an existing

18 problem?

19 A. I don't know for sure that there is an existing

20 problem. I believe it's been cleared up, but there's

21 always room for human error on both sides. So I can't say

22 that it's never going to happen again.

23 Q. Are you aware of customers being dropped from

24 the 411 directory database?

25 A. Yes, I am.

0086

1 Q. When did that problem arise?

2 A. I don't know the exact date.

3 Q. Did it not start for two months or was it from

4 the very beginning?

5 A. I don't believe it started -- no, there might

6 have been a problem in the beginning. I escalated that to

7 Debby Nightingale.

8 Q. Has that issue been resolved?

9 A. No, it has not.

10 Q. Are you aware of customers improperly being
11 listed when they had an unpublished number?

12 A. No, I am not.

13 Q. Are you also aware of customers that were
14 dropped -- there is a 411 database. Is there a separate
15 database for 555-1212?

16 A. Yes.

17 Q. Are you aware of customers being dropped from
18 that latter customer database?

19 A. I believe it was the other way around, I
20 believe.

21 Q. But there were some discussions in some of the
22 issues that MCI raised with you dealing with the 555-1212
23 database?

24 A. No, I don't believe so. It was -- I tried the
25 number personally. It was when I was working on one for
0087

1 Southern California. I tried the 415, San Francisco, so

2 it was definitely in the local database that I got very
3 involved with that. It was not in 555, that I know of.

4 Q. Are you also aware of problems having customers
5 migrated to a CLC other than MCI, even though the order
6 was to have customers migrated to MCI?

7 A. No, I am not aware of that, I don't think.

8 Q. Are you aware of problems involving a
9 customer's -- let me back up.

10 Are you aware of customers' contact number on

11 the order, does that mean something to you?

12 A. Yes.

13 Q. That, presumably, is the number where the
14 customer can be reached other than the number that is at
15 issue being migrated?

16 A. Correct.

17 Q. Are you aware of the customer contact number
18 being disconnected in connection with the processing of
19 orders?

20 A. No, I am not. Not being disconnected, no.

21 Q. Are you aware of something happening to the
22 customer contact numbers?

23 A. Yes.

24 Q. And what was that?

25 A. I don't remember exactly what it was, but I
0088
1 don't remember it being a disconnect. I believe it might
2 have gotten migrated.

3 Q. With these various customer problems, did
4 Pacific Bell or you maintain any kind of records as these
5 issues were raised by MCI as to what the problems were?

6 A. We might have.

7 Q. In your --

8 A. Pacific Bell might have.

9 Q. You already talked about the RMC's creating an
10 issue list.

11 A. Yes.

12 Q. Is that the only recitation or written recording

13 of these problems that you have?

14 A. I don't know.

15 Q. When you were involved in these conference calls
16 with MCI, you participated on those calls both listening
17 and speaking?

18 A. Correct.

19 Q. You took notes?

20 A. Yes, I took notes, yes.

21 Q. Do you maintain those notes in a file somewhere?

22 A. Some of them I sent out to MCI on Microsoft Mail
23 or whatever we use.

24 Q. But do you have handwritten notes that you
25 maintain while on those calls?
0089

1 A. I don't know that I have all of them, but, yes,

2 I did take notes at times.

3 Q. Do you have them maintained in a file somewhere?

4 A. No, I do not.

5 Q. Where are they?

6 A. They are probably -- some of them are on my desk
7 and some of them could be in this book and my filing
8 system. I don't have it all in one exact place.

9 Q. If we make a request to try to get copies of
10 those records, you'd be able to go to the various places
11 you described and to provide them to your counsel?

12 A. Okay. Could I give you what I have?

13 MR. KOLTO-WININGER: Just say --

14 THE WITNESS: I guess.

15 MR. KOLTO-WININGER: The request is for me for
16 the documents, but you would be able to locate them, is
17 the correct answer?

18 THE WITNESS: Yes.

19 MR. McDONALD: Q. Nobody has told you to do
20 anything with those documents?

21 A. No.

22 Q. Maybe we could talk about the escalation
23 procedure for a little bit. You have used that word
24 several times.

25 Can you explain to me what you mean by
0090
1 escalation?

2 A. If something needed to be migrated, not migrated
3 sooner, but if there was a problem and MCI didn't get
4 something, say, migrated on the due date that they were
5 told, they would escalate it through Victoria or Ann Long
6 at one time; it's changed a lot. There wasn't really an
7 escalation policy, per se, at that time, but Ann Long did
8 do escalations.

9 Q. Initially, in September, you were identified to
10 MCI as being the principal contact person; is that right?

11 A. I was the resale marketing consultant on the MCI
12 account team.

13 Q. What does that mean?

14 A. I would talk with MCI and get them into the --
15 help them into the resale business. But there was a lot
16 of other people involved. I was just the main person in

17 the account team.

18 Q. But in September, if MCI had a problem with

19 whether a FOC was being issued properly or customers were

17 the account team.

18 Q. But in September, if MCI had a problem with
19 whether a FOC was being issued properly or customers were
20 experiencing dial tone, did Pacific instruct MCI to
21 contact any particular individual at Pacific to identify
22 these problems?

23 A. A lot of things went through me.

24 Q. Weren't you presented as the --

25 A. On the account team. So, yes, if there was a
0091
1 problem, it did come through me.

2 Q. But wasn't the account team there functioning to
3 act as a --

4 A. Yes, but the LISC got more involved, just like
5 the process people did, because there was more people that
6 needed to be involved than just me.

7 Q. You mean as more problems came up, you
8 increasingly brought in the people who were at these
9 specific places where the problems needed to be addressed?

10 A. Not specifically problems, other questions that
11 maybe I didn't know the answers to because I did not work
12 in the LISC.

13 Q. Was there any kind of a procedure for escalating
14 problems to be addressed?

15 A. No, not a written procedure.

16 Q. Has there ever been a written procedure for
17 escalation?

18 A. I believe there's been one written recent. I do

19 not know if MCI has a copy of that. I am not sure.

20 Q. Have you seen one, the written escalation
21 procedure?

22 A. No, I have not. Yes, I glanced at one, but I
23 have not actually looked at it.

24 Q. Do you know who created it?

25 A. Somebody in the -- no, I don't.
0092

1 Q. Was it Ann Long, do you think?

2 A. I don't know.

3 Q. And do you know if that escalation procedure has
4 been shared with MCI or any other CLC?

5 A. I do not know that.

6 Q. Do you know if it's been shared with anyone
7 outside of Pacific?

8 A. I don't know.

9 Q. Do you know what the procedure is?

10 A. Right now it's exactly, I think, what MCI is
11 doing, which you would go to Victoria Flood on all
12 escalations. I don't know if it was what --

13 Q. To make a determination as to whether something
14 is probably done -- for MCI to go to Victoria whenever it
15 has a problem that needs to be addressed quickly.

16 A. Yes.

17 Q. Do you know what Victoria does when MCI contacts
18 her?

19 A. Not exactly, no.

20 Q. Who does Victoria report to?

21 A. Chuck McDonald.

22 Q. What area are they in?

23 A. The LISC.

24 Q. Are they subordinate to Ann Long?

25 A. I don't believe so, not anymore.

0093

1 Q. Do you think they used to be at one time?

2 A. Victoria worked for Ann at one point.

3 Q. She no longer works for Ann?

4 A. I believe she works for Chuck McDonald.

5 Q. Now, if a problem was reported to you, loss of

6 dial tone in October, what would you do at that time?

7 A. It would depend on the reason for loss of dial

8 tone. I believe that if it was on the due date, I would

9 go to the LISC. If it was after the due date, it would go

10 into repair, I believe.

11 Q. Do you know why that differentiation was made?

12 A. Because I believe that's the way it is on the

13 retail side of the house.

14 Q. We talked about due date. Can we walk through

15 sort of the order process if there were not these

16 problems? The order would come in, there would be a FOC

17 issued; is that right?

18 A. I believe so. I do not do the order process.

19 Q. There would be some kind of a due date

20 established through that; is that right?

21 A. I don't know if it's in the FOC before or after.

22 Q. You were talking about the due date. I was

23 trying to find out when you understand the due date came
24 into play.

25 A. I don't know when it comes back to MCI.
0094

1 Q. So you don't -- you don't know if MCI
2 establishes a due date or if Pacific?

3 A. We have standards. Migration is three business
4 days, standards, guidelines. But I don't know when we --
5 if there was a new connect and said it needed to be three
6 days just, per se, I don't know when we would tell MCI
7 that if it's on the FOC or -- I am assuming that's when it
8 is. I am not involved in that part of the process.

9 Q. You said the standard is three days?

10 A. For migration.

11 Q. And those three days from when?

12 A. The date it gets there, I believe, does not
13 count. On Monday, Tuesday, Wednesday would be the date.

14 Q. In an ideal world, if the order came in with no
15 errors and no error on either side, and no back-log that
16 Pacific was dealing with, an order would come in and
17 within four hours a FOC would come into MCI, and within
18 three days of the order being accepted, the migration
19 would occur?

20 A. Correct.

21 Q. And then Pacific would have advised MCI that the
22 migration had taken place?

23 A. Not until the completion, I believe, and that
24 could be like 48 hours or so later because of the system

25 that needs to be completed. I believe it's 48 hours, I am
0095

1 not positive.

2 Q. How would MCI be apprised of the completion?

3 A. No, I believe it would go through NDM.

4 Q. And previously it was through fax?

5 A. Fax.

6 Q. Do you know what percentage of orders that were
7 submitted by MCI since September have met that standard in
8 terms of the FOC being issued within four hours, the
9 migration occurring within three days, and then MCI being
10 notified of the completion within 48 hours thereafter?

11 A. No, I do not.

12 Q. Do you know if any have?

13 A. No, I don't know.

14 Q. Do you know of any that have been?

15 A. Pardon me?

16 Q. Do you know of any that have met that standard?

17 A. I don't know.

18 MR. McDONALD: Let's take a brief break.

19 (Recess taken.)

20 MR. McDONALD: Q. We talked at one point
21 earlier about MCI calling directly in to Victoria Flood or
22 other people at the LISC?

23 A. Correct.

24 Q. Do you remember that?

25 Is there a system in place that tells MCI, for
0096

1 these issues, call this person at the LISC, as opposed to

2 you or Debby Nightingale?

3 A. Yes.

4 Q. There is?

5 A. Yes, I believe so.

6 Q. Where is that system?

7 A. I don't know. I just know that it's been told

8 to directly call Victoria on escalations.

9 Q. On all escalations?

10 A. I believe so, yes.

11 Q. And you believe someone told MCI that?

12 A. Yes.

13 Q. And who do you believe at Pacific --

14 A. I know I told MCI that personally before to

15 Sandy McGinn, who is my main contact, and I believe Kathy

16 Korona has told them. I don't know if there is a document

17 out or not.

18 Q. But they still call you on certain issues?

19 A. Yes.

20 Q. And they are supposed to call Victoria with

21 escalation issues?

22 A. Correct.

23 Q. How do you distinguish the two?

24 A. Escalation.

25 Q. What's an escalation?

0097

1 A. If they need a sooner due date, I would say it's

2 an escalation. If they want a sooner due date, for some

3 reason, or an order in the backlog that needs to be issued

4 immediately or something, they would call Victoria.

5 Q. So just so I understand, escalation is something

6 that requires a little different treatment than the

7 ordinary handling of an expedite treatment in some

8 instances, something like that?

9 A. Yes.

10 Q. If it's an ongoing continuing problem they might

11 talk to you if this doesn't require some special handling?

12 A. They really shouldn't be talking to me about

13 escalation. They would talk to me if there was a problem

14 with the LISC, say, getting back to them in a timely

15 manner, then they should come to me. I have heard about

16 them before as an FYI kind of keep an eye on this and make

17 sure it goes smoothly. I don't actually go do the work.

18 Q. In terms of contacting the LISC, was MCI given a

19 phone number, here is Victoria's number or here is the

20 LISC number, was it a Victoria specific number?

21 A. Victoria specific.

22 Q. Are you aware of MCI representatives being put

23 on hold when they call in to the LISC?

24 A. Yes, I have been told that from MCI.

25 Q. Are you aware of them getting busy signals?

0098

1 A. Yes.

2 Q. And being put on the voice mail?

3 A. That, I am not sure what happened. There was an

4 MCI issue problem there and there was also a Pacific Bell

5 problem, I believe.

6 Q. But you heard about MCI trying to reach someone
7 at the LISC and receiving voice mail?

8 A. I believe we found out that she was on the wrong
9 number completely when she was holding for the hour. It
10 wasn't Pacific Bell. She didn't call the correct phone
11 number. She was on hold to a completely different
12 company.

13 Q. Is that the only instance of someone being put
14 on hold?

15 A. No.

16 Q. Are you aware that MCI representatives do call
17 the LISC and are put on hold?

18 A. I wasn't aware that they were just put on hold
19 necessarily. I know there was a problem getting into the
20 LISC, but we have corrected that problem.

21 Q. As far as you know currently, there is no
22 problem with calling into the LISC?

23 A. As far as I know, it's been corrected with more
24 people and automatic call distributor has been put in the
25 LISC, I believe, to correct this problem.
0099

1 Q. How would the automatic call distributor —

2 A. It would make sure that there were people open.
3 I have been calling the LISC occasionally and I have been
4 getting through in a quick manner.

5 Q. Are you aware of another problem that has been
6 reported, which was customers were asked to be migrated to
7 another CLC, then losing its listing in the Yellow Pages?

8 A. No.

9 Q. You have never heard about that?

10 A. No.

11 Q. Do you know what LSR, all caps, stands for?

12 A. Yeah. Local -- I believe, Local Service Record,

13 no. LSR, Local Service Record, I believe. I can't say

14 for sure.

15 Q. Whatever your best recollection is. Okay.

16 And what is an LSR?

17 A. It's the form that comes over to request a

18 migration or a new connect or anything in the LISC.

19 Q. And when MCI started it, it submitted LSR's via

20 fax?

21 A. Correct.

22 Q. And currently it's using this mechanized system

23 called NDM; is that right?

24 A. For some of their orders, correct.

25 Q. Does an order over NDM come in as an LSR as
0100

1 well?

2 A. I believe -- I don't know that for sure. I

3 believe that is still what it's called.

4 Q. In terms of the process at the LISC, do you know

5 what the difference is between an order that's received

6 via fax versus one that's received via NDM?

7 A. One is mechanized and one is manual.

8 Q. And so at the LISC, what does that mean when

9 they receive one via fax? You told us there was a scan

10 process and then an entry. With NDM, is there a similar

11 kind of exercise?

12 A. I don't know.

13 Q. What is the name of the database or the system

14 that contains the billing information for existing Pacific

15 customers?

16 A. CRIS, C-R-I-S.

17 Q. And do you know what that acronym is?

18 A. No, I do not. I don't know.

19 Q. Is that used in this process, the resale

20 migration orders?

21 A. I don't understand that question.

22 Q. Is the CRIS system, C-R-I-S, used in the process

23 of effectuating the migration with a customer from Pacific

24 to another carrier?

25 A. I don't know.

0101

1 Q. We talked earlier about discrepancies in

2 addresses and names causing an order to be rejected. How

3 was that rejection accomplished? Was it by machine, a

4 computer, or an individual person looking at it?

5 A. It was a person.

6 Q. So what would happen when somebody at the LISC

7 would look and say, This name does not identically

8 match -- the name on the order does not identically match

9 the name in our database for the customer, therefore, we

10 are going to reject it?

11 A. I believe so, yes.

12 Q. But that's no longer being done today?

13 A. No, it's not. We are not rejecting for a

14 different name because it's MCI, we may want to make a
15 change on that.

16 Q. When was this change effectuated?

17 A. I don't know exactly. Quite early on.

18 Q. We talked about the four-hour turnaround for the
19 FOC's. Do you know if that's anywhere in writing? Did
20 you see that?

21 A. I believe it's in the CLC handbook.

22 Q. Is there any other place that you saw it written
23 down?

24 A. Not that I know of.

25 Q. Do you know if there are written instructions
0102

1 for people working at the LISC as to when a rejection
2 notice should be issued versus when a FOC should issue?

3 A. I don't know that.

4 Q. As far as you know, you never saw any such
5 documentation?

6 A. Not that I can remember personally.

7 Q. Do you know if that kind of information was
8 provided to MCI or any other CLC?

9 A. Reject codes have been provided to MCI. I have
10 given them to them.

11 Q. Right. But the instructions to the -- the
12 instruction to the LISC worker as to when to reject an
13 order, do you know if those instructions were ever shared

14 with CLC's?

15 MR. KOLTO-WININGER: I guess I am confused. She
16 said she didn't know about that type of document, so it
17 assumes that she does know about that type of document.

18 MR. McDONALD: Q. You are not aware that any
19 instructions ever existed as to when to reject an order?

20 A. I am speculating, because I just haven't seen
21 them. But I would think that there, of course, would be.
22 You'd have to have instructions on how to reject them.

23 Q. But you never saw them?

24 A. No, personally, I have not.

25 Q. You are not aware of them being shared with the
0103
1 CLC's?

2 A. I did share rejections, but I don't know that it
3 had instructions on --

4 MR. KOLTO-WININGER: He is asking something
5 different.

6 THE WITNESS: I'm sorry.

7 MR. McDONALD: Q. I'm asking about the
8 instruction to the LISC operator.

9 A. I don't know.

10 Q. Do you know what MCI or another CLC would do
11 with a FOC when it was received?

12 A. No.

13 Q. Do you know what information was on a FOC?

14 A. No.

15 Q. Do you know what system within Pac Bell records

16 FOC's?

17 A. It depends on how the order is sent, I believe.

18 Q. What are the possible variations?

19 A. I believe if it's NDM, it would come over

20 through NDM, but I don't know how that system is set up.

21 And I believe if it was paper, it would go either through

22 CESAR or something called LTD; it's a tracking base. I

23 don't know one was used. I believe it's CESAR, but I

24 could be getting confused.

25 Q. Do you know who has responsibility for those
0104

1 systems, who would have access to that information,

2 tracking the FOC's?

3 A. It would depend, I guess. I mean, the LTD

4 system, you can log into that application, which is

5 another one at the LISC that I probably didn't mention

6 before because I wasn't thinking of it, along with CESAR,

7 whoever would have that on their terminal, you could show

8 there if it's been FOC'd back.

9 Q. But as the RMC for MCI, you didn't maintain

10 running records of the FOC's?

11 A. Oh, no.

12 Q. Or of the backlog?

13 A. I, personally, no.

14 Q. I think you told us earlier that there was a

15 system in place to track the pending orders; is that

16 right? It was either a spreadsheet you said, I think, or

17 some kind of a system in place, is that right, currently?

18 A. When the orders come in, yes.

19 Q. But it was not in place since September?

20 A. Not the same system, no.

21 Q. And do you know where those records are

22 maintained, as to the status at any particular time

23 between September and today, of MCI's orders?

24 A. No, I do not.

25 Q. Who would know where those are?

0105

1 A. I believe someone in the LISC.

2 Q. Would Ann Long be the best person to know or

3 Victoria Flood?

4 A. Ann Long, I would think.

5 Q. Are you aware that MCI has requested CSR's from

6 Pacific?

7 A. Yes.

8 Q. Do you know why MCI asked for the CSR's?

9 A. Yes.

10 Q. Why is that?

11 A. So that they can know what the customer has at

12 their location so they can migrate them properly, I

13 believe.

14 Q. Did Pacific ever commit to providing CSR's

15 within a prescribed time period?

16 A. Yes.

17 Q. And what was that time period?

18 A. I am thinking I am getting them mixed up with

19 the FOC, four hours or 24 hours. I can't remember.

20 Q. Do you know when that time frame was

21 established?

22 A. In a workshop, I believe.

23 Q. So that was before September of '96?

24 A. I believe so, yes. For a certain type of order,

25 there is a limit, though, in the amount of lines in that
0106

1 time frame.

2 Q. The time period would be 24 hours, or four or 24

3 hours from what? When would the clock start to tick?

4 A. I don't know.

5 Q. It would be from when the order was received or

6 from when the FOC was issued?

7 A. It wouldn't have anything to do with a FOC.

8 Q. Did MCI ever notify you that CSR's were not

9 being received timely?

10 A. Yes.

11 Q. When did you first hear that complaint?

12 A. I don't know the exact date.

13 Q. Do you know the month?

14 A. No.

15 Q. Did it start at the very beginning?

16 A. No.

17 Q. Did it begin within the first two months of

18 commencement of the live orders?

19 A. I don't believe so. Well, business started

20 later and that's who was pulling CSR's, but they might

21 have been pulling them earlier. Yes, they were pulling

22 them before they started doing live orders on the business

23 side, a lot of them.

24 Q. And what did you do in response to the complaint

25 that MCI lodged with you about the CSR's?

0107

1 A. I went to several people, came up on conference

2 calls, Leslie Wood was aware of it, Ann Long, all the same

3 people that were on the conference calls. They have

4 staffed more people.

5 Q. Your response was to get people at the LISC

6 involved?

7 A. Correct, and process people.

8 Q. In this instance and these other instances that

9 we talked about, when problems were identified for you and

10 you go to Ann Long or Victoria Flood or Debby Nightingale,

11 do you keep on top of the problem and report back to MCI

12 as to its status, or was the issue then transferred over

13 to the person that you've reported to?

14 A. It would depend. I usually keep on top of the

15 issues unless I was told that I am no longer handling it.

16 Q. Which issues did you stay with versus those that

17 were transferred?

18 A. The day-to-day issues I am still involved with.

19 The listings, it's being investigated and it's been

20 escalated -- along with the backlog has been escalated.

21 Q. So listing and backlog have been escalated,

22 meaning, now that's the responsibility of --

23 A. Somebody else.